

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE

JOHNNY CRUZ

Debtor

:
:
:
:
:
:
:
:
:

CHAPTER 13

CASE NO 17-15159MDC

CERTIFICATION OF NO RESPONSE TO DEBTOR'S MOTION TO MODIFY PLAN

The Debtor, through counsel, hereby avers:

1. On April 28, 2020, Debtor filed the above-captioned motion (the "Motion"). Doc. No. 62.
2. On April 28, 2020, the Motion and Notice of Motion was served upon all secured and priority creditors.
3. Pursuant to Local Bankruptcy Rule 9014-3, any response to the Motion was due no later than May 19, 2020.
4. As of this date, no response has been filed to the Motion.

WHEREFORE, Debtor prays that the Court enter an order granting the relief requested in the Motion.

/s/ Alfonso Madrid
ALFONSO MADRID, ESQ.
Attorney for Debtor
Community Legal Services of Philadelphia
Philadelphia PA 19140
(215) 227-4795
Amadrid@clsphila.org